

# EXHIBIT

“A”



**Service of Process  
Transmittal**

08/05/2021

CT Log Number 540031941

**TO:** Litigation Department  
Federal Express Corporation  
3620 HACKS CROSS RD, 3RD FLOOR, BUILDING B  
MEMPHIS, TN 38125

**RE: Process Served in New York**

**FOR:** FedEx Corporation (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Roman Khaytin, Pltf. vs. FedEx Corporation And John Doe/Jane Doe, etc., Dfts.

**DOCUMENT(S) SERVED:** Notice, Attachment(s),?Summons,?Verified Complaint, Verification

**COURT/AGENCY:** Kings County Supreme Court, NY  
Case # 5188652021

**NATURE OF ACTION:** Personal Injury - Vehicle Collision - 12/01/20219

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, New York, NY

**DATE AND HOUR OF SERVICE:** By Process Server on 08/05/2021 at 15:45

**JURISDICTION SERVED :** New York

**APPEARANCE OR ANSWER DUE:** Within 20 days after service, exclusive of the day of service

**ATTORNEY(S) / SENDER(S):** Vel Belushin  
Belushin Law Firm, P.C.  
1712 Kings Highway, Suite 2  
Brooklyn, NY 11229  
718-787-4470

**ACTION ITEMS:** CT has retained the current log, Retain Date: 08/06/2021, Expected Purge Date: 08/11/2021

Image SOP

Email Notification, Litigation Department lydia.langbein@fedex.com

Email Notification, Stacey Stephens stacey.stephens@fedex.com

Email Notification, Cynthia Schwind cynthia.schwind@fedex.com

Email Notification, Kathy Miller khmiller@fedex.com

**REGISTERED AGENT ADDRESS:** C T Corporation System  
28 Liberty Street  
New York, NY 10005  
877-564-7529  
MajorAccountTeam2@wolterskluwer.com



**Service of Process  
Transmittal**

08/05/2021

CT Log Number 540031941

**TO:** Litigation Department  
Federal Express Corporation  
3620 HACKS CROSS RD, 3RD FLOOR, BUILDING B  
MEMPHIS, TN 38125

**RE: Process Served in New York**

**FOR:** FedEx Corporation (Domestic State: DE)

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

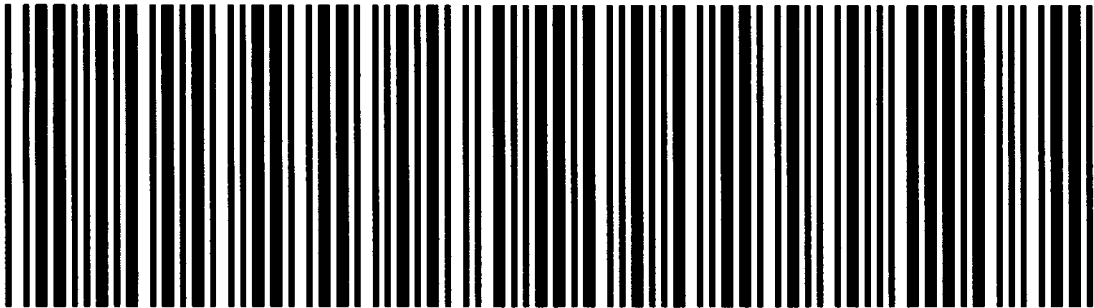


**PROCESS SERVER DELIVERY DETAILS**

**Date:** Thu, Aug 5, 2021

**Server Name:** Christopher Klein

Entity Served	FEDEX CORPORATION
Case Number	518865/2021
Jurisdiction	NY



SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
ROMAN KHAYTIN,

Plaintiff/Petitioner,

- against -

Index No. 518865/2021

FEDEX CORPORATION and JOHN DOE/ JANE  
DOE, First and Last Names Being Fictitious as

Unknown to Plaintiff, representing Defendant/Respondent.

~~an unidentified person driving a motor vehicle,~~

bearing an unknown license  
plate number,

-----X  
**NOTICE OF ELECTRONIC FILING**  
**(Mandatory Case)**  
(Uniform Rule § 202.5-bb)

**You have received this Notice because:**

1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and

2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

**If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.**

The **benefits of participating in e-filing** include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

**To register for e-filing or for more information about how e-filing works:**

- visit: [www.nycourts.gov/efile-unrepresented](http://www.nycourts.gov/efile-unrepresented) or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at [www.nycourts.gov](http://www.nycourts.gov)

To find legal information to help you represent yourself visit [www.nycourthelp.gov](http://www.nycourthelp.gov)

**Information for Attorneys  
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

1) immediately record his or her representation within the e-filed matter on the NYSCEF site [www.nycourts.gov/efile](http://www.nycourts.gov/efile) ; or

2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: [efile@nycourts.gov](mailto:efile@nycourts.gov)).

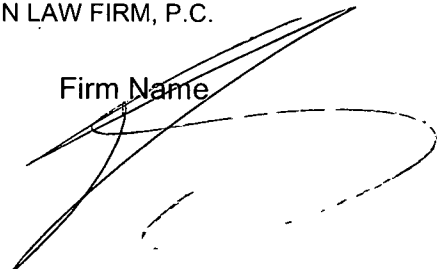
Dated: 07/28/2021

VEL BELUSHIN, ESQ.

Name

BELUSHIN LAW FIRM, P.C.

Firm Name



SIGNATURE

1712 KINGS HIGHWAY

Address

BROOKLYN, NY 11229

718-787-4470

Phone

EFILE@BELUSHINLAW.COM

E-Mail

To: FEDEX CORPORATION

c/o Corporation Service Company

28 LIBERTY STREET

NEW YORK, NEW YORK 10005

JOHN DOE/ JANE DOE

ADDRESS PRESENTLY UNKNOWN

6/6/18

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

Index No.: 518865/2021  
Date Purchased: 7/28/2021

-----X  
ROMAN KHAYTIN,

**SUMMONS**

Plaintiff,

Plaintiff designates Kings  
County as the place of trial.

-against-

FEDEX CORPORATION and JOHN DOE/JANE DOE, First  
and Last Names Being Fictitious as Unknown to Plaintiff,  
representing an unidentified person driving a motor vehicle,  
bearing an unknown license plate number,

The basis of venue is:  
Plaintiff's residence

Plaintiff resides at:  
2752 Ocean Avenue, Apt. 5B  
Brooklyn, NY 11229  
County of Kings

Defendants.  
-----X

**To the above named Defendants:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within thirty (30) days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York  
July 28, 2021

Yours, etc.



\_\_\_\_\_  
Vel Belushin, Esq. for  
BELUSHIN LAW FIRM, P.C.  
Attorneys for Plaintiff  
**ROMAN KHAYTIN**  
1712 Kings Highway, Suite 2  
Brooklyn, New York 11229  
718-787-4470  
File No.: 19-0185WC

TO: FEDEX CORPORATION  
C/O Corporation Service Company  
28 Liberty Street  
New York, New York 10005

JOHN DOE/ JANE DOE  
Address Presently Unknown

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
ROMAN KHAYTIN,

Plaintiff,

Index No.: 5188651001  
Date Purchased: 7/28/2021

-against-

**VERIFIED COMPLAINT**

FEDEX CORPORATION and JOHN DOE/JANE DOE, First  
and Last Names Being Fictitious as Unknown to Plaintiff,  
representing an unidentified person driving a motor vehicle,  
bearing an unknown license plate number,

Defendants.  
-----X

Plaintiff, by his attorneys, **BELUSHIN LAW FIRM, P.C.**, complaining of the  
Defendants herein, respectfully alleges, as follows:

1. At all times herein mentioned, Plaintiff, **ROMAN KHAYTIN**, was, and still is, a resident of the County of Kings, City and State of New York.
2. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, was and still is a resident of a County in the State of New York or Pennsylvania.
3. The true name or capacity, whether individual, corporate, associate, or otherwise, and Defendantship of Defendant, **JOHN DOE/JANE DOE**, is unknown to Plaintiff at the time of the filing of this Complaint, who therefore sues said Defendant by such fictitious name and will ask leave of the Court to amend this Complaint to show the true name or capacity and Defendantship when the same has been ascertained. Plaintiff is informed and believes, and based upon such information and belief, alleges that each Defendant designated herein as a **DOE** was



responsible, negligently or in some other actionable manner, for the events and happenings referred to herein that proximately caused injury to Plaintiff as hereinafter alleged.

4. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, was and still is, a domestic corporation duly organized and existing under, and by virtue of, the Laws of the State of New York.

5. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, was, and still is, a foreign corporation duly organized and existing under, and by virtue of, the Laws of the State of New York.

6. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, was, and still is, a partnership duly organized and existing under, and by virtue of, the Laws of the State of New York.

7. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, was, and still is, a non-profit organization duly organized and existing under, and by virtue of, the Laws of the State of New York.

8. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, maintained a principal place of business in the County and State of New York.

9. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, was the owner of a Switch Truck motor vehicle, numbered 15775.

10. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, was the lessor of the Switch Truck motor vehicle, numbered 15775.

11. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, managed the Switch Truck motor vehicle, numbered 15775.

12. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, maintained the Switch Truck motor vehicle, numbered 15775.

13. At all times herein mentioned, Defendant, **FEDEX CORPORATION**, controlled the Switch Truck motor vehicle, numbered 15775.

14. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, was the operator of the Switch Truck motor vehicle, numbered 15775.

15. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, was the lessee of the Switch Truck motor vehicle, numbered 15775.

16. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, managed the Switch Truck motor vehicle, numbered 15775.

17. At all times herein mentioned upon information and belief, Defendant, **JOHN DOE/JANE DOE**, maintained the Switch Truck motor vehicle, numbered 15775.

18. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, controlled the Switch Truck motor vehicle, numbered 15775.

19. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, operated the Switch Truck motor vehicle, numbered 15775, with the knowledge of Defendant, **FEDEX CORPORATION**.

20. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, operated the Switch Truck motor vehicle, numbered 15775, with the permission of Defendant, **FEDEX CORPORATION**.

21. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, operated the Switch Truck motor vehicle, numbered 15775, with the consent of Defendant, **FEDEX CORPORATION**.

22. At all times herein mentioned, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, operated the Switch Truck motor vehicle, numbered 15775, within the scope of his/her employment with Defendant, **FEDEX CORPORATION**.

23. At all times herein mentioned, 1000 Willow Brook Road, in the County of North Hampton, State of Pennsylvania, was a FedEx facility.

24. That on December 1, 2019, upon information and belief, Defendant, **JOHN DOE/JANE DOE**, was operating the Switch Truck motor vehicle, numbered 15775, at the aforementioned location.

25. That on December 1, 2019, Plaintiff, **ROMAN KHAYTIN**, was a lawful pedestrian, at the aforementioned location.

26. That on December 1, 2019, at the aforementioned location, the Switch Truck motor vehicle owned by Defendant, **FEDEX CORPORATION** and operated by Defendant, **JOHN DOE/ JANE DOE**, struck Plaintiff, **ROMAN KHAYTIN**, a lawful pedestrian.

27. That as a result of the aforesaid collision, Plaintiff, **ROMAN KHAYTIN**, was seriously and permanently injured.

28. That the aforesaid collision was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

29. That the Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid motor vehicle and the Defendants were otherwise negligent, careless and reckless in the circumstances then and there prevailing.

30. That by reason of the foregoing, Plaintiff, **ROMAN KHAYTIN**, sustained severe and permanent personal injuries; and Plaintiff, **ROMAN KHAYTIN**, was otherwise damaged.

31. That Plaintiff, **ROMAN KHAYTIN**, sustained serious injuries as defined by §5102 of the Insurance Law of the State of New York.

32. That Plaintiff, **ROMAN KHAYTIN**, sustained serious injury and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

33. That Plaintiff, **ROMAN KHAYTIN**, is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. Plaintiff is only seeking to recover those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

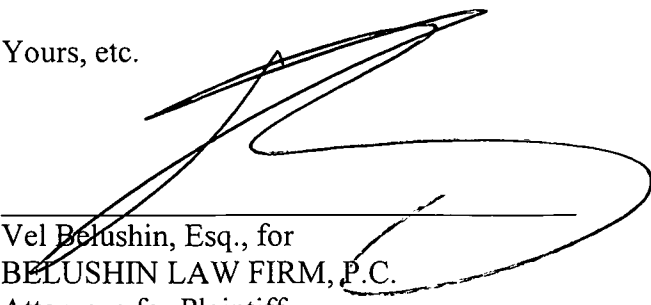
34. That this action falls within one or more of the exceptions set forth in CPLR §1602.

35. That by reason of the foregoing, Plaintiff, **ROMAN KHAYTIN**, has been damaged in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**WHEREFORE**, Plaintiff demands judgment against the Defendants herein, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Brooklyn, New York  
July 28, 2021

Yours, etc.



Vel Belushin, Esq., for  
BELUSHIN LAW FIRM, P.C.  
Attorneys for Plaintiff

**ROMAN KHAYTIN**  
1712 Kings Highway, Suite 2  
Brooklyn, New York 11229  
718-787-4470  
File No.: 19-0185WC

TO: FEDEX CORPORATION  
C/O Corporation Service Company  
28 Liberty Street  
New York, New York 10005

JOHN DOE/ JANE DOE  
Address Presently Unknown

**ATTORNEY'S VERIFICATION**

**VEL BELUSHIN**, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury: I am an attorney at BELUSHIN LAW FIRM, P.C., attorneys of record for Plaintiff, **ROMAN KHAYTIN**. I have read the annexed **COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

This verification is made by me because Plaintiff is not presently in the county wherein I maintain my offices.

Dated: Brooklyn, New York  
July 28, 2021

  
\_\_\_\_\_  
VEL BELUSHIN, ESQ.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
ROMAN KHAYTIN,

Plaintiff,

-against-

FEDEX CORPORATION and JOHN DOE/JANE DOE, First and Last  
Names Being Fictitious as Unknown to Plaintiff,  
representing an unidentified person driving a motor vehicle,  
bearing an unknown license plate number,

Defendants.  
-----X

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**SUMMONS & VERIFIED COMPLAINT**

---

BELUSHIN LAW FIRM, P.C.

Attorneys for Plaintiff

**ROMAN KHAYTIN**

1712 Kings Highway, Suite 2

Brooklyn, New York 11229

(718) 787-4470

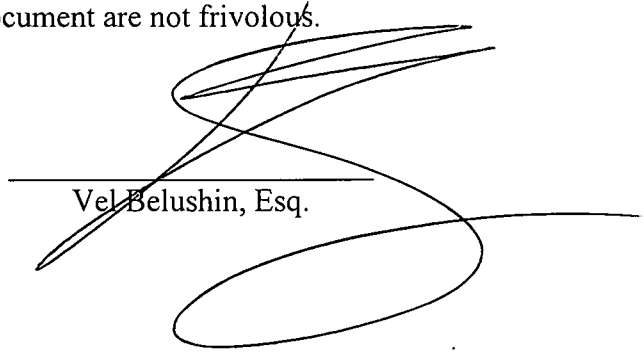
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TO: FEDEX CORPORATION  
C/O Corporation Service Company  
28 Liberty Street  
New York, New York 10005

JOHN DOE/ JANE DOE  
Address Presently Unknown

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Pursuant to 22NYCR 130-1.1 the undersigned, an attorney admitted to practice in the courts of New York State, certifies that upon information and belief and reasonable inquiry, the contents contained in the annexed document are not frivolous.

  
\_\_\_\_\_  
Vel Belushin, Esq.

Dated: July 28, 2021